

FILED

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL

A21-0243
A21-0546

April 29, 2022

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**AFFIDAVIT OF ADAM L.
SIENKOWSKI IN SUPPORT OF
WATTSON PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, COSTS,
AND DISBURSEMENTS**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

matter.

3. As required by Rule 119.02, the billing detail in Exhibit A contains a description of each item of work performed, the date upon which it was performed, the amount of time spent on each item of work, the identity of the lawyer or legal assistant performing the work, and the hourly rate sought for the work performed.

4. A summary of the amounts reflected in Exhibit A attached to this Affidavit is thus provided:

Attorney/Timekeeper	Hourly Rate Sought	Hours Expended	Fees Requested
James H. Gilbert (JHG)	\$600	65.10	\$39,060.00
Adam L. Sienkowski (ALS)	\$400	520.20	\$208,080.00
Jody E. Nahlovsky (JEN)	\$400	138.00	\$55,200.00
Nancy M. Vold Legal Assistant (NMV)	\$125	14.85	\$1,856.25
TOTAL			\$304,196.25

5. As additionally set forth in the Affidavit of James H. Gilbert, the normal hourly rate and hours charged by the Wattson Plaintiffs' attorneys, Adam L. Sienkowski, James H. Gilbert, and Jody E. Nahlovsky, are reasonable and consistent with reasonable and customary rates charged in the Minneapolis and St. Paul legal community for attorneys in complex, important litigation.

6. I have reviewed the time records of the James H. Gilbert Law Group, PLLC and hereby verify that the work performed was for the benefit of the client and was

necessary for the proper representation of the client and that there are no charges for unnecessary or duplicative work.

7. I further verify that the amounts sought represent the actual out-of-pocket costs to our law firm for the disbursements sought. The requested actual costs and disbursements total \$1,163.87 and consist of:

- \$150.50 Process Service Fee incurred for the service of the Summons and Complaint;
- \$305.00 Filing Fee to initiate the case and file the Summons and Complaint with Carver County District Court; and
- \$708.37 in printing charges to have 11 sets of the Wattson Plaintiffs' maps printed which included 9 sets for the Panel per the Panel's Plan Submission Requirements, one client copy and one working copy.

No request has been made for reimbursement of the costs incurred for approximately 13,000 photocopies, parking charges and other out of pocket costs. These are part of the law firm's office overhead and are factored into the attorneys' hourly rate.

8. In total, the Wattson Plaintiffs seek \$305,360.12 in reimbursement for attorneys' fees, costs and disbursements.

9. The James H. Law Group, PLLC, commenced its representation of the Wattson Plaintiffs in February 2021. I worked as the lead attorney on this matter, accounting for 520 hours of the total 723 attorney hours incurred by our law firm. I worked closely with Plaintiff Peter S. Wattson, a national redistricting expert who previously worked as General Counsel for the Minnesota Senate for over 40 years. I also spent

significant time consulting with Plaintiff Joseph Mansky, who previously worked as the Minnesota state election director, the Ramsey County election manager, and manager of Governor Jesse Ventura's Citizen Advisory Commission on Redistricting, and Plaintiff League of Women Voters Minnesota ("League").

10. We did not redact any of our time entries in the billing detail submitted as Exhibit A. The appeal period in this matter has expired. Given any award from this Panel will come from public taxpayer funds, our clients and law firm believe it is important and necessary to provide a full disclosure and accounting of our time records and charges. The Wattson Plaintiffs have advocated for transparency throughout this process, and our fee petition follows this approach.

11. Our law firm took a very specific approach to avoid duplication of efforts in this litigation. I acted as lead attorney, completing a vast majority of the research and writing. I was the main point of contact for our clients. I was the only attorney from our law firm on nearly all phone calls and meetings with our clients. I was the point of contact for all opposing counsel, and for nearly every call I was the only attorney from our law firm on the call. I made all arguments to the Panel so that only one attorney would have to prepare for argument. This approach is made apparent in our time records which show I incurred approximately 72% of all time incurred by our law firm.

12. Jody Nahlovsky, a duly licensed attorney who previously clerked at the Minnesota Court of Appeals and has worked at our law firm for over ten years, assisted in research and drafting throughout this litigation. A vast majority of her time was incurred researching, reviewing, and drafting written submissions to this Panel, including briefs,

affidavits and other documents. Involvement of two attorneys in drafting submissions in a case of this complexity and importance is reasonable and necessary, especially when there are four parties and voluminous submissions that must be reviewed, analyzed, and responded to within very short timeframes.

13. James H. Gilbert is a duly licensed attorney and former Minnesota Supreme Court Justice, who was a certified trial lawyer, former gubernatorial campaign advisor and former candidate for statewide office himself. James H. Gilbert was heavily involved in strategy, planning and review of submissions and edits. We rely on his experience to chart a path forward. He reviewed submissions to offer input and help craft responses and prepare for arguments. His involvement in this case was invaluable, reasonable, and necessary.

14. Our law firm incurred time preparing for this case prior to and in furtherance of filing the pleadings (60 hours). This time was necessary to meet with and understand the goals and objectives of our clients. After James H. Gilbert spent approximately 10 hours meeting and strategizing with Plaintiff Peter Wattson to determine a path forward, I began researching in detail prior redistricting litigation, decisions, and national trends in order to create and prepare a proper technical and procedural path forward in this litigation. This included reviewing cases and other legal authorities cited by prior redistricting panels and parties. Given Plaintiffs Peter Wattson's and Joseph Mansky's extensive experience in redistricting litigation, this also included numerous teleconferences with them to discuss strategy, approach and objectives. We were also in the middle of the Covid-19 pandemic which created new rules with respect to filing and service that we had to ensure were

followed.

15. The Complaint in this matter was complex and lengthy. Given we were seeking relief for constitutional violations on behalf of approximately 5.7 million Minnesotans, our law firm determined that it was critical to follow settled law to ensure accurate and complete filings. It was not lost on us that failure to take procedurally proper steps could subject any decision to appeal and have profound impacts on the upcoming elections.

16. The Wattson Plaintiffs, who filed the Complaint on February 19, 2021 and the Supreme Court Petition on February 22, 2021, were the first Plaintiffs in Minnesota redistricting litigation to ever submit proposed plans (Wattson Plaintiffs' Complaint, Exhibits A, B, C) as well as proposed redistricting principles (Exhibit D, pp. 9-11). The filing of these exhibits was consistent with the stated goal of the Wattson Plaintiffs throughout this litigation, which was to make this process as transparent as possible. While the other parties chose to withhold their redistricting principles and plans until the last possible moment, the Wattson Plaintiffs filed a version of their plans (which were modified based on the Panel's redistricting principles) approximately nine months before they were required to do so. This was done in an effort to give both the public and the other parties ample time to review and critique the Wattson Plaintiffs' plans and redistricting principles. While reviewing and understanding these exhibits with our clients required additional attorney time and effort and deviated from past law firm's practice in Minnesota redistricting litigation, this gave the public the opportunity to review, comment, and critique (a version of) the Wattson Plaintiffs' plans before they were ordered to be filed by

this Panel. These maps and reports were posted on the website of the League of Women Voters Minnesota for all to see. Given the importance of this matter and the need for public input and review, the Wattson Plaintiffs determined that filing plans and redistricting principles at the onset of the litigation was an important and necessary step to take that will hopefully be repeated in the future.

17. In a case that is the nature of a class action involving the constitutional rights of so many, the 60 hours incurred by our law firm leading up to and filing of the Complaint and Petition were necessary and reasonable. Approximately 31% of the total hours incurred by James H. Gilbert in this entire matter were prior to filing of the Complaint and Petition, and his involvement was critical to evaluate the claims of the Plaintiffs, create a case strategy, and communicate and establish a path forward for our clients. Mr. Gilbert's experience as a former Supreme Court Justice, having previously traveled the state and twice campaigned as a candidate himself, as well as his involvement as a lawyer and candidate advisor to other candidates and as a judge in other election cases, was critical to help ensure the case was set forth on the right track. This front-end work is important and critical in any case, but even more so here where so much is at stake. The conferences, extensive legal research, document review, drafting of the complaint and exhibits, review of complaint exhibits such as plans and principles, robust and thorough filings, and strategy sessions were necessary and reasonable. No two cases are ever the same, and while there has been previous redistricting litigation in this state, we needed to ensure that all the proper actions were taken in filing this litigation in light of the changes in population and updates to the law to prevent a redistricting plans order that could be susceptible to challenge and

delay the elections. The Wattson Plaintiffs were the only parties to do this work at the onset of this litigation, and the 20.7 hours by James H. Gilbert, 9.0 hours by Jody E. Nahlovsky and 30.5 hours by me through February 22, 2021 were necessary and reasonable to prepare for and begin prosecution of this litigation.

18. From February 23, 2021 through June 6, 2021, our attorneys incurred 9.8 hours in this matter. This time was reasonable and necessary to respond to the Attorney General's Office's request for an extension, which included multiple phone calls and emails. Our law firm also began to prepare for the prospect of initial disclosures and a discovery plan in the event the Supreme Court did not assert jurisdiction within the timeframes prior to these disclosures being due. We also reviewed the complaint in intervention filed by the Anderson Plaintiffs, the order asserting jurisdiction by the Supreme Court, the Sachs Plaintiffs' pleadings, and the order consolidating the Sachs and Wattson cases. We reviewed new census information released in April, discussed potential changes to the Wattson Plaintiffs' redistricting plans and had phone calls and emails with other parties regarding the litigation. The 9.8 hours for this work was necessary and reasonable.

19. From June 7, 2021 through June 23, 2021, our attorneys incurred 24.75 hours in this matter. A vast majority of this time was spent preparing for and filing a motion to join the League of Women Voters Minnesota to this case. This required meeting with our initial clients to discuss and determine their thoughts, concerns and objectives with respect to adding the League to this litigation, as well as conferences with the League to discuss their objectives in joining the litigation. Given that we could only submit one set of plans

on behalf of all the Plaintiffs we represent, we also had to spend time to make sure that the goals of the League and our existing clients were aligned. Having the League be part of this litigation was a benefit to countless voters in this state, but we had to take the necessary steps to ensure that the litigation objectives of the initial Plaintiffs aligned with the mission of the League, which is to, “Empower Voters” and “Defend Democracy.”

20. Given the unique procedural posture of these proceedings, legal research regarding joinder was also necessary to ensure the proper steps were taken. A memorandum, affidavit and motion documents had to be drafted, and we were also required to amend our complaint as a result of this joinder. The 3.55 hours incurred by James H. Gilbert, 6.2 hours incurred by Jody E. Nahlovsky and 15 hours incurred by me were reasonable and necessary to take the steps necessary to add the League to this lawsuit. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect these issues. This resulted in no duplication of effort among attorneys.

21. From June 24, 2021 through August 13, 2021, our attorneys incurred 39.65 hours in this matter. Our attorneys reviewed various motions for intervention filed by the parties, communicated with opposing counsel, performed research regarding interventions, conferred with our client, prepared strategy going forward, and performed a detailed review of the prior redistricting litigation. We also internally discussed filing a response to the objection to our motion to join the League by the Anderson Plaintiffs and had discussions with our clients. We spent 3.1 hours on July 19 beginning a draft response to this objection which, for strategic reasons, we did not ultimately file. I spent 23.4 hours reviewing the extensive record in the 2011-2012 *Hippert* litigation. This in-depth review of seven binders

included reading all redistricting principles and plans submission briefs, reviewing maps and reports submitted by the parties, reading all court orders, including redistricting principles orders and plans submission order, reviewing legal authorities cited by the panel and parties, studying maps and reports issued by the prior panel, reading all correspondence filed with the court, and reading all stipulations and scheduling orders. This also included marking up and making notes about these documents.

22. This review was time consuming but critical. We were approaching a time where the parties were to begin negotiating stipulations regarding preliminary issues and redistricting principles and having a firm understanding of what took place in the prior litigation was necessary. We were also about to begin having in depth discussions about our maps and reports and redistricting principles and knowing the positions of the panel and the parties in the prior litigation was necessary. While this review did take time, it allowed us to streamline the process, follow past procedure and ensure correct steps were taken in this case involving the constitutional rights of 5.7 million Minnesotans. The 5.55 hours incurred by James H. Gilbert, 5.8 hours incurred by Jody E. Nahlovsky and 28.3 hours incurred by me from June 24, 2021 through August 13, 2021 were reasonable and necessary. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect these issues. This resulted in no duplication of effort among attorneys.

23. The end of August marked the beginning of the very labor-intensive stretch of this litigation. From August 14, 2021 through October 12, 2021, our law firm incurred 108.55 hours in this matter. This time included preparing the first draft stipulation with

respect to preliminary issues circulated among the parties, having telephone conferences with our clients to discuss where they were willing to compromise on stipulation issues, and reviewing redistricting principles to prepare for the upcoming stipulation and submissions due on October 12.

24. The Wattson Plaintiffs were the only party to object to the Data Science Intervenors intervention. This successful objection was after conferences within our law firm and our clients regarding the basis for an objection and whether to object. This objection was filed only 5 days after the motion for intervention was filed and required legal research regarding scheduling orders and intervention, reviewing the public record for potential notice of the lawsuit, and drafting a memorandum. This objection allowed the litigation to remain streamlined and more cost effective.

25. This timeframe also required reviewing proposed stipulations regarding preliminary issues from the other parties and having telephone conferences with the other parties. Our office took the lead in taking redlines to our stipulation created by the other parties and compiling them into a draft that encompassed the changes of all the parties and emailing that draft to everyone on September 17.

26. Given this stipulation was a negotiation, I also had numerous phone calls and email exchanges with my clients regarding the same. We traded drafts and ideas to try and come up with areas where we could compromise. We ultimately did compromise on certain issues which helped to streamline this litigation.

27. In addition to the stipulation, we had to craft a statement of unresolved issues to file with the Panel. This required discussions with our clients as to which issues they

wanted to raise with the Panel and which issues they were willing to cede ground on.

28. Following the filing of the stipulation and statement of unresolved issues, we began to focus intensely on the Wattson Plaintiffs' redistricting principles. While we did have a framework for our principles because they were included in the complaint, we needed to provide the legal authority and argument necessary to support these principles. In concert with this, we were negotiating redistricting principles with the other parties for the redistricting principles stipulation.

29. The Wattson Plaintiffs' redistricting principles brief required significant research and drafting. This 40-page brief cited to substantial state and federal authority as well as a number of secondary sources that discussed the state of redistricting around the United States and proposed legislative bills in the state of Minnesota. The Wattson Plaintiffs were the only party to submit affidavit testimony with their redistricting principles which provided the reasoning behind many of the Wattson Plaintiffs' principles through sworn testimony. The Wattson Plaintiffs were also one of two parties to submit proposed plan submission requirements to guide the court in this aspect. The 2.25 hours incurred by James H. Gilbert, 32.2 hours incurred by Jody E. Nahlovsky and 74.1 hours incurred by me from August 14, 2021 through October 12, 2021 were reasonable and necessary. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect these issues. This resulted in no duplication of effort among attorneys.

30. From October 13, 2021 through November 3, 2021, our law firm attorneys incurred 99.9 hours in this matter. Given the parties had eight days to respond to the

redistricting principles of the other parties, and then 14 more days to prepare for oral argument, this was a high intensity time frame. This required our firm to review three responsive briefs, review the cases and other legal authority they cited, conduct legal research with respect to their arguments, and craft a response. We had numerous calls, meetings and emails with our clients discussing where our best efforts should be focused in our response.

31. After briefs were submitted, I had to review, understand and prepare to argument involving eight briefs and four sets of redistricting principles. I conferred with the other attorneys at our firm regarding how to approach this argument and what to focus on. Mr. Gilbert and Ms. Nahlovsky performed limited review of the submissions of the parties in an effort to aid in argument preparation. These conferences are vital in cases of high importance and require the input of multiple attorneys to keep the argument focused. Preparation also included preparing comments and responses to potential questions and having a complete understanding of the vast landscape of case law governing redistricting principles.

32. The 9.5 hours incurred by James H. Gilbert, 13.1 hours incurred by Jody E. Nahlovsky, and 77.3 hours incurred by me from October 13, 2021 through November 3, 2021 were reasonable and necessary. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect these issues. This resulted in no duplication of effort among attorneys.

33. From November 4, 2021 through December 7, 2021, our law firm attorneys incurred 130.0 hours in this matter. A vast majority of this time was spent preparing the

Wattson Plaintiffs' plan submissions. I had countless conversations and emails with Peter Wattson to discuss the form of our maps and reports and the other content we would submit with the plans. We made every effort to submit maps that were as clear as possible, including being the only party to include the boundaries and name of every city in Minnesota on our state and congressional statewide maps. I worked with Mr. Wattson to review and tweak the maps so that we could provide the Panel with a clear visual of the state and its political subdivision boundaries. We were one of two parties to submit plans with affidavit testimony and were the only party to offer affidavit testimony averring that the plans were made in an effort to comply with the Panel's redistricting principles and were not drawn with partisan intent. This affidavit also showed the impact on minority incumbents and provided other important information, sworn to under oath by Plaintiff Peter Wattson.

34. We also made great effort to provide information necessary to enforce the Panel's principle that plans were not to be drawn with the intent to favor any party, candidate or incumbent. Our submissions included a 'base map' which provided maps and reports of the *Hippert* plans. These *Hippert* maps provided by the Wattson Plaintiffs clearly showed every political subdivision boundary in the state and gave the Panel a clear picture of the *Hippert* plans that were in place during the litigation. We also included Maptitude reports of the current *Hippert* legislative and congressional maps. While Peter Wattson created these maps and reports, there were numerous iterations of this information and significant other information and documents that were considered and I worked extensively with Mr. Wattson to determine what information, format and documents would best aid

the Panel in drawing its plans.

35. We also submitted affidavits from Plaintiff Joseph Mansky and Nick Harper of the League to provide further sworn testimony to the Panel to support the Wattson Plaintiffs' plans. Neither the Republicans (Anderson Plaintiffs) nor Democrats (Sachs Plaintiffs) provided any testimony or identified the creator of their plans. The Wattson Plaintiffs justified their plans on numerous grounds. These additional affidavits did require additional attorney time, but sworn testimony averring that the plan creators are not running afoul of the Panel's principles was necessary in a proceeding affecting the rights of 5.7 million Minnesotans.

36. The Wattson Plaintiffs' 108-page memorandum contained approximately 95 tables and maps to aid the Panel. The creation of these tables and maps took considerable time and effort, but we felt it was a necessary step to take when a proceeding is so heavily influenced by the lines on the maps and various data points. While my time records do not evidence every phone conversation I had with Peter Wattson, Joseph Mansky and Nick Harper, I was continually on the phone with these Plaintiffs to discuss our approach and plans for presentation to the Panel.

37. When my time records indicate entries for 10 hours (12/2/2021), 14 hours (12/5/2021) or 14.5 hours (12/6/2021), these entries are not simply blocks of time entered. Days with a 14- or 14.5-hour entry generally involve me arriving at the office around 7am and leaving around or after 11pm. I do not bill for meals or other time when I am not working on the file. Other significant entries, such as a 16.5 hour entry on December 16, 2021 and 15.5 hour entry on December 17, 2021 consisted of days that began prior to 7am

and ended after midnight.

38. The 5.3 hours incurred by James H. Gilbert, 15.0 hours incurred by Jody E. Nahlovsky, and 109.7 hours incurred by me from November 4, 2021 through December 7, 2021 were reasonable and necessary. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect these issues. This resulted in no duplication of effort among attorneys.

39. From December 8, 2021 through December 17, 2021, our law firm attorneys incurred 132.3 hours in this matter. This time was necessary to review the redistricting plans and briefs of the parties and submit a response within 10-days. Our law firm was tasked with drafting a response to the Anderson Plaintiffs' 78-page legislative memorandum and 56-page congressional memorandum; the Sachs Plaintiffs' 42-page legislative memorandum and 34-page congressional memorandum; and the Corrie Plaintiffs' 95-page legislative memorandum and 22-page congressional memorandum. We had to thoroughly review the maps submitted by the parties and review thousands of pages of reports submitted by the parties. This was essentially a round-the-clock task that occurred for ten days straight. I was on the phone with Mr. Wattson daily and often to discuss the parties' plans and how we should respond to them. I had discussions with Mr. Wattson on what we should submit with our response, in addition to our memorandum.

40. Mr. Wattson and I made the decision to submit maps of all of the parties' plans for numerous reasons. First and foremost, it was difficult to decipher the exact location of the boundaries in the maps submitted by the other parties. We felt it would be helpful to the Panel to have maps for all the parties' plans that contained the level of detail

included in the Wattson Plaintiffs' maps. We also wanted to make it easy for the Panel to determine whether a party was drawing its plans with the intent to protect, defeat or promote a candidate, incumbent, or political party. We did this by including partisan data on the maps of all the parties. We also included inner metro maps showing minority populations for each district to aid the Panel in understanding the effect the plans had on minorities. We included multiple affidavits in support of this response so that the record contained sworn testimony verifying the contents of the maps and other information submitted.

41. Mr. Wattson also created a plan comparison that compared all the parties' plans using metrics relevant to the Panel's redistricting principles. We cited this comparison often in our responsive brief and believe it was a useful tool for the Panel. While Mr. Wattson created these maps, reports and comparisons that were filed with our response brief, he and I had numerous discussions and meetings about our submissions. This time spent was reasonable and necessary and was in an effort to give the Panel as much information as possible to engage in the very important task of drawing redistricting plans that affect the constitutional rights of 5.7 million Minnesotans.

42. Ms. Nahlovsky spent the most significant portion of her time on this case (30%) during this intense 10-day period where we had to review the large plan submissions by the parties and draft a response. Given the size and scope of the undertaking, her involvement was critical in order to do the necessary legal research, write each and every section of the brief, review and cite check the brief for accuracy, and perform other necessary and indispensable work to complete these tasks.

43. The 41.0 hours incurred by Jody E. Nahlovsky and 91.3 hours incurred by me from December 8, 2021 through December 17, 2021 were reasonable and necessary. While Ms. Nahlovsky did incur significant time during this high intensity period, I incurred the majority of the hours with respect these issues. This resulted in no duplication of effort among attorneys.

44. From December 18, 2021 through January 4, 2022, our law firm attorneys incurred 108.4 hours in this matter. This time was spent preparing for oral argument. The Wattson Plaintiffs took a unique approach to oral argument. Instead of focusing on legal points and authorities outlined in the parties' memoranda, the Wattson Plaintiffs used oral argument as an opportunity to compare the legislative maps of each of the parties to this case as well as the *Hippert* plans. In employing this strategy, I worked extensively with Plaintiff Peter Wattson to create maps of each area of the state for use in our presentation. These maps used only census data that was already in the record. To create these maps, I reviewed and compared the maps of all of the parties and the *Hippert* maps, determined the best way to focus and compare the parties' plans, cropped the section of the maps I wanted to use, and Mr. Wattson used Maptitude to create a close up, clear map for each of the parties of the chosen sections. He would then email those maps to me for use in the presentation.

45. Importantly, we also included pie charts of minority voting age population to show the Panel the effect of the parties' plans on minority voters. We believe that this information was valuable and provided a clear picture to the Panel of the location of certain communities within each district, and showed the practical effect of drawing district lines

one way or the other. A vast majority of these 76 maps in our presentation were new and created for oral argument. At times, Mr. Wattson would provide, and I would review, numerous iterations of the same area until before we settled on a final version that we felt best compared the parties' plans and would be most beneficial to the Panel.

46. In preparing for oral argument, I also spent significant time reviewing the responsive briefs of the parties so that these arguments could be responded to during oral argument. I conferred with Mr. Gilbert and Ms. Nahlovsky and was coached regarding strategy and approach to the argument. Their attendance at the argument was reasonable and necessary to discuss our afternoon session and rebuttal during our two-hour break during the middle of the day based on what we heard from the other parties in the morning. Much of what we discussed with our law firm and clients during that break was presented during our afternoon arguments.

47. Learning the boundaries of each district of each party and the *Hippert* panel required rigorous preparation, but we felt this approach was the best way to aid the Panel in understanding the implications of each parties' plans and to really gain a good understanding of how the parties' plans differed. The 11.8 hours incurred by James. H. Gilbert, 14.5 hours incurred by Jody E. Nahlovsky, and 82.1 hours incurred by me from December 18, 2021 through January 4, 2022 were reasonable and necessary. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect to oral argument preparation. This resulted in no duplication of effort among attorneys.

48. From January 5, 2022 through February 24, 2022, our attorneys incurred 9.95

hours in this matter. This included emails and phone calls with our clients to discuss oral argument, review of the Panel's redistricting plans, and phone calls and meetings with our clients to discuss any possible next steps. This review of the Panel's plans was necessary so that we could discuss the plans and order with our client, determine whether there were any issues that needed to be addressed or resolved, and ensure the plans and order were consistent with Minnesota and federal law. Our office also had attorney conferences about these issues to discuss the Panel's order and plans and any potential outstanding issues that needed to be addressed going forward. The 2.75 hours incurred by James. H. Gilbert, 1.2 hours incurred by Jody E. Nahlovsky, and 6.0 hours incurred by me from January 5, 2022 through February 24, 2022 were reasonable and necessary. Also, consistent throughout this entire litigation, I incurred the vast majority of the hours with respect to these issues. This resulted in no duplication of effort among attorneys.

49. Attorneys at our office incurred little time for issues related to press and legislative committee activities. These entries totaled 5.7 hours and were mixed in with other work performed, meaning the actual total was far less. That said, the press will inevitably call in a case of this nature. It is imperative that attorneys explain to their clients the legal effect that statements to the press can have on their case. Our office did not draft press releases, but during pending litigation we have a legal and ethical obligation to review these documents before they are made public.

50. While our office of attorneys engaged in minimal attorney conferences, these conferences were critical in this case to exchange ideas, refine arguments, and focus on final positions. Some inter-office attorney conferences with the three attorneys were

necessary for coordination and strategic planning in this complex matter.

Consistent with Minnesota Statute § 358.116, I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: April 29, 2022

/s/ Adam L. Sienkowski
Adam L. Sienkowski

Hennepin County, Minnesota
County and State where signed

EXHIBIT A TO AFFIDAVIT OF ADAM L. SIENKOWSKI

			<u>Hours</u>	<u>Amount</u>
2/7/2021	JHG	Initial discussions and review of issues, cases, timing: Peter W.	3.00	\$1,800.00
2/8/2021	JHG	Review messages to H, S, Principle, Hippert case; telephone conference with Peter.	2.00	\$1,200.00
2/12/2021	JHG	Review exhibits, filing info; edit drafts; miscellaneous calls.	2.50	\$1,500.00
2/13/2021	JHG	Complaint and exhibits; retainer and billing issues.	3.00	\$1,800.00
2/15/2021	ALS	Review emails and documents from client, including pleadings, exhibits, and prior redistricting litigation.	3.50	\$1,400.00
2/16/2021	JHG	Review petition to set, rules, past practice.	2.00	\$1,200.00
	ALS	Telephone conference with client; review pleadings; legal research regarding complaint issues.	3.00	\$1,200.00
2/17/2021	JEN	Review and edit complaint; draft summons and civil cover sheet.	3.00	\$1,200.00

			<u>Hours</u>	<u>Amount</u>
2/17/2021	ALS	Review supreme court and district court filing requirements, rules regarding petitions at supreme court, complaint, petition and exhibits; telephone conferences and emails with client; review 2011 lawsuit.	4.70	\$1,880.00
2/18/2021	JHG	Draft; review.	2.00	\$1,200.00
	ALS	Emails with process server; review service requirements in light of COVID-19; review and revise complaint and send revisions to client; review exhibits; telephone conferences and emails with client.	4.10	\$1,640.00
2/19/2021	JHG	Zoom call: Mr. Sienkowski, Joe, Peter; filing.	2.00	\$1,200.00
	JEN	Review and edit complaint and petition.	5.00	\$2,000.00
	ALS	Review, revise and finalize complaint and exhibits; Zoom meeting with clients; telephone conferences and emails with clients; prepare pleadings for filing with district court; send pleadings out for service on defendants; telephone conferences with process server; review supreme court petition; make revisions and send to client.	9.50	\$3,800.00
2/20/2021	JHG	Miscellaneous emails, edits.	0.50	\$300.00
	JHG	Miscellaneous calls, issue discussions - Joe, Peter, Adam.	0.70	\$420.00
	ALS	Telephone conference with client; emails regarding pleadings.	0.40	\$160.00
2/21/2021	JHG	Zoom conference call regarding filings and press release.	0.70	\$420.00
	JHG	Conference call with Joe, Peter and Adam regarding filing status, press inquiries.	0.80	\$480.00

			<u>Hours</u>	<u>Amount</u>
2/21/2021	ALS	Zoom meeting with clients regarding strategy.	0.60	\$240.00
2/22/2021	JHG	Confirm filing status; miscellaneous emails; press questions.	1.00	\$600.00
	JEN	Review and finalize petition.	1.00	\$400.00
	ALS	Review, revise, and finalize supreme court petition; send revisions to client; finalize affidavits and letters to court; file petition with supreme court; serve petition on respondents; emails with client.	5.00	\$2,000.00
3/2/2021	ALS	Telephone conference with AG's office regarding answer extension; email to client; conference with Mr. Gilbert.	0.40	\$160.00
3/3/2021	ALS	Telephone conference with AG's office granting Answer extension; email to AG regarding same.	0.30	\$120.00
3/4/2021	ALS	Email to county attorney granting Answer extension.	0.20	\$80.00
3/8/2021	ALS	Review rules of civil procedure regarding disclosures; telephone conference with client.	0.40	\$160.00
3/19/2021	ALS	Review complaint in intervention; review rules of civil procedure regarding same.	1.00	\$400.00
3/23/2021	JHG	Miscellaneous emails; review supreme court order.	0.50	\$300.00
3/24/2021	ALS	Email ad phone call with AG attorney regarding answer.	0.40	\$160.00
3/25/2021	ALS	Telephone conference with counsel for intervenor regarding their intervention.	0.20	\$80.00
4/23/2021	JHG	Review new map, population data.	0.70	\$420.00
4/26/2021	JHG	Review DFL complaint; miscellaneous emails.	1.00	\$600.00

			<u>Hours</u>	<u>Amount</u>
4/27/2021	JHG	Review census, new case info.	1.50	\$900.00
	ALS	Review Ramsey County Complaint; telephone conference with client.	0.80	\$320.00
4/29/2021	ALS	Review Ramsey County case petition; telephone conference with opposing counsel; review documents filed in Ramsey County case, including complaint.	1.50	\$600.00
5/6/2021	JHG	Review article, legislative intention.	0.50	\$300.00
5/20/2021	ALS	Review supreme court order; email to clients.	0.40	\$160.00
6/7/2021	ALS	Review client emails; review procedural requirements of adding party at Supreme Court.	0.50	\$200.00
6/8/2021	JHG	Review emails, additional plaintiff; LWV; discuss with Mr. Sienkowski.	0.75	\$450.00
	JEN	Telephone conference with client; attorney discussion regarding procedure and further steps regarding joinder of additional party.	1.70	\$680.00
	ALS	Zoom conference with client; review prior districting cases regarding intervention; legal research joinder; draft and send retainer to MLWV.	2.40	\$960.00
6/9/2021	JHG	Motion to add LWV; Supreme Court Rules.	0.80	\$480.00
6/14/2021	JEN	Draft and edit motion to join League of Women Voters Minnesota and memorandum; draft declaration.	2.50	\$1,000.00
6/15/2021	ALS	Miscellaneous emails; review joinder filings.	0.60	\$240.00
6/16/2021	ALS	Miscellaneous emails regarding LWVMN participating.	0.40	\$160.00
6/17/2021	ALS	Emails with LWV; draft statement.	0.40	\$160.00

			<u>Hours</u>	<u>Amount</u>
6/21/2021	JHG	Review motion, order, press releases; finalize.	1.00	\$600.00
	JEN	Conference with Mr. Sienkowski; legal research regarding motion to amend and motion for joinder; edit memorandum.	1.50	\$600.00
	ALS	Draft and review joinder filings.	5.00	\$2,000.00
6/22/2021	JHG	Conference with Mr. Sienkowski; motion for LWV.	0.50	\$300.00
	ALS	Continue drafting motion to join League.	4.40	\$1,760.00
6/23/2021	JHG	Edit memorandum; file motion.	0.50	\$300.00
	NMV	Conference with Mr. Sienkowski; download documents from court site; prepare and send service letter; organize file.	1.00	\$125.00
	JEN	Review and edit motion documents for filing.	0.50	\$200.00
	ALS	Finalize and file motion to join League.	1.30	\$520.00
6/29/2021	ALS	Review intervenor filings.	0.30	\$120.00
6/30/2021	JHG	Review motion, panel order, emails, case law; conference.	2.00	\$1,200.00
	JEN	Review intervenor response to motion to joinder; conference with attorneys regarding panel and strategy.	1.50	\$600.00
	ALS	Telephone conference with opposing counsel; review court filings; email to clients.	0.60	\$240.00
7/1/2021	JHG	Review prior supreme court redistricting order, supreme court decision 2011.	1.50	\$900.00
	ALS	Telephone conference with client regarding response motion.	0.20	\$80.00

			<u>Hours</u>	<u>Amount</u>
7/15/2021	NMV	Download, print and index pleadings.	1.25	\$156.25
	NMV	Download documents from court site; index.	1.25	\$156.25
7/16/2021	NMV	Download documents from court site; index.	1.00	\$125.00
	JEN	Review intervenor submissions.	0.50	\$200.00
7/17/2021	ALS	Telephone conference with client regarding common cause intervention.	0.40	\$160.00
7/19/2021	JEN	Review and edit potential response to Republican reply regarding joinder.	0.80	\$320.00
	ALS	Draft response to objection to Motion to Join League; review prior supreme court filings regarding intervention.	2.30	\$920.00
7/21/2021	JHG	Review order; strategy session, schedule, testimony, rebuttal.	1.30	\$780.00
	NMV	Download documents from court site; index.	1.00	\$125.00
	JEN	Review supreme court order and client emails.	0.50	\$200.00
	ALS	Conference with Mr. Gilbert; review 2011 scheduling order; email to client; review court order.	0.70	\$280.00
7/22/2021	ALS	Review 2011 redistricting litigation and create working file.	5.50	\$2,200.00
7/23/2021	ALS	Continue review of 2011 redistricting litigation.	1.50	\$600.00
7/26/2021	ALS	Review 2011-2012 redistricting filings; serve amended complaint.	5.40	\$2,160.00
7/27/2021	ALS	Review 2011-2012 redistricting filings.	2.00	\$800.00

			<u>Hours</u>	<u>Amount</u>
7/28/2021	JEN	Review 2011-12 submissions and court orders.	2.50	\$1,000.00
	ALS	Review 2011-2012 redistricting filings; review complaint.	3.50	\$1,400.00
7/30/2021	ALS	Review maps and submissions from 2011-2012 redistricting litigation.	3.50	\$1,400.00
8/4/2021	ALS	Review 2011-2012 plan briefs.	2.00	\$800.00
8/10/2021	JHG	Review testimony; discuss strategy.	0.75	\$450.00
	ALS	Review court filings; email to client.	0.20	\$80.00
8/13/2021	ALS	Email to client.	0.20	\$80.00
8/18/2021	ALS	Review complaint and exhibits for plaintiff principles.	2.00	\$800.00
8/27/2021	JEN	Review previous redistricting submissions and orders.	2.00	\$800.00
8/30/2021	JEN	Review stipulation and statement of unresolved issues.	1.00	\$400.00
	ALS	Telephone conference with client; review principles; review court filings; legal research regarding principles and redistricting.	3.20	\$1,280.00
8/31/2021	ALS	Telephone conference with opposing counsel; draft stipulation.	0.90	\$360.00
9/1/2021	ALS	Email to counsel.	0.30	\$120.00
9/2/2021	ALS	Review prior 2011 stipulations, statements of unresolved issues, and court orders regarding the same; email to clients regarding stipulation; finalize and send draft stipulation to clients.	0.80	\$320.00
9/3/2021	JEN	Review press release and stipulation; telephone conference with clients.	2.00	\$800.00

			<u>Hours</u>	<u>Amount</u>
9/3/2021	ALS	Prepare for and Zoom call with client regarding stipulation; review motion for intervention filings; emails regarding conference call scheduling for stipulation.	2.40	\$960.00
9/6/2021	JEN	Review client emails and Partisanship Report.	2.50	\$1,000.00
9/7/2021	JHG	Draft objection; edits; calls with Lou R.; emails.	0.75	\$450.00
	ALS	Draft response to Data Science Professors' Motion for Intervention; review client emails; revise stipulation; emails with client.	6.20	\$2,480.00
9/8/2021	JEN	Edit opposition to Proposed Data Scientists' Motion to Intervene.	1.20	\$480.00
	ALS	Finalize and file objection to Data Science Professors' Motion for Intervention.	0.60	\$240.00
9/9/2021	NMV	Conferences with Mr. Sienkowski; download court documents and index; prepare service letter.	3.00	\$375.00
9/10/2021	JEN	Review proposed stipulation, court order; telephone conference with attorneys.	2.00	\$800.00
9/13/2021	JEN	Review Plaintiff Peter Wattson's proposed testimony; client emails.	0.50	\$200.00
	ALS	Review client testimony before house.	0.20	\$80.00
9/16/2021	ALS	Telephone conference with client regarding stipulations.	0.40	\$160.00
9/17/2021	JEN	Review red-lined stipulations drafts; telephone conference with attorneys.	0.50	\$200.00
	ALS	Review all stipulations and compile into new draft; review prior redistricting suit stipulations; prepare for and conference call with all parties regarding stipulations.	3.40	\$1,360.00

			<u>Hours</u>	<u>Amount</u>
9/21/2021	ALS	Review draft stipulation from opposing counsel; draft redlines; emails with clients and other parties.	0.80	\$320.00
9/22/2021	JEN	Review statements of unresolved issues for 9/24 submission.	0.70	\$280.00
	ALS	Draft statement of unresolved issues and send to clients; review 2011 filings regarding the same; review stipulation draft.	2.20	\$880.00
9/23/2021	ALS	Revise statement of unresolved issues and email to client; emails.	0.50	\$200.00
9/24/2021	ALS	Finalize and file statement of unresolved issues; emails with clients and other parties.	0.90	\$360.00
9/27/2021	ALS	Review client email; email to client; set up conference call.	0.30	\$120.00
9/28/2021	JEN	Review client drafts, news article.	1.00	\$400.00
	ALS	Review client drafts; telephone conference with client.	0.70	\$280.00
9/29/2021	ALS	Review and revise principles; emails with client.	0.60	\$240.00
9/30/2021	JEN	Review emails regarding proposed redistricting principles.	0.30	\$120.00
	ALS	Revise and finalize redistricting principles and plan submission requirements; prepare for and telephone conference with opposing counsel regarding redistricting principles; telephone conference with client.	1.50	\$600.00
10/1/2021	JEN	Review news article regarding divided congressional districts and memorandum regarding proposed redistricting principles; draft brief.	2.50	\$1,000.00

			<u>Hours</u>	<u>Amount</u>
10/4/2021	JEN	Review proposed principles; draft and edit brief.	3.50	\$1,400.00
10/5/2021	JEN	Review parties' proposed redistricting principles before teleconference.	1.00	\$400.00
	ALS	Legal research; draft redistricting principles brief; emails with client; draft redline stipulation and send to opposing counsel; review other parties' principles.	3.40	\$1,360.00
10/6/2021	JEN	Review parties' proposed redistricting principles and attorney teleconference.	1.00	\$400.00
	ALS	Revise and draft redistricting principles brief and affidavit; legal research; emails and telephone conferences with client.	7.80	\$3,120.00
10/7/2021	ALS	Review cases regarding redistricting.	1.00	\$400.00
10/8/2021	JEN	Edit principles brief and draft Wattson Affidavit.	3.00	\$1,200.00
	ALS	Draft and revise redistricting principles brief; review cases and legal research; emails with client.	5.00	\$2,000.00
10/9/2021	ALS	Revise and draft redistricting principles brief and affidavit; legal research; emails and telephone conferences with client; emails with opposing counsel.	10.50	\$4,200.00
10/10/2021	JHG	Edit principles brief.	1.50	\$900.00
10/11/2021	JEN	Edit brief.	1.00	\$400.00
	ALS	Revise and draft redistricting principles brief and affidavit; draft stipulation and email to opposing counsel; emails and telephone conferences with client; emails with opposing counsel.	11.50	\$4,600.00
10/12/2021	JEN	Finalize principles brief and affidavit for filing.	6.50	\$2,600.00

			<u>Hours</u>	<u>Amount</u>
10/12/2021	ALS	Continue to draft redistricting principles brief and affidavit; finalize redistricting principles brief and affidavit; emails with clients; finalize stipulation; file documents; emails with opposing counsel.	7.00	\$2,800.00
10/13/2021	JEN	Review principles briefs submitted by other parties.	1.20	\$480.00
	ALS	Review submissions by parties regarding redistricting principles; Zoom meeting with clients; legal research partisanship principles issue.	3.00	\$1,200.00
10/15/2021	ALS	Legal research and draft Rely Brief.	2.00	\$800.00
10/18/2021	JEN	Review and edit responsive brief; review cited caselaw and argument.	2.00	\$800.00
	ALS	Draft response brief; emails with client.	5.20	\$2,080.00
10/19/2021	JEN	Review and finalize responsive brief.	1.20	\$480.00
	ALS	Draft response brief; emails with client.	7.50	\$3,000.00
10/20/2021	JEN	Review and finalize responsive brief.	1.20	\$480.00
	ALS	Draft response brief; emails with client; finalize and file brief and affidavit.	7.00	\$2,800.00
10/21/2021	ALS	Review party redistricting submissions; review cases.	2.50	\$1,000.00
10/22/2021	JEN	Review parties' responsive briefs; conference with Mr. Sienkowski.	1.50	\$600.00
	ALS	Review party redistricting submissions; legal research; emails with clients.	2.10	\$840.00
10/25/2021	ALS	Review maps and reports; review cases for oral argument; emails with client.	3.50	\$1,400.00

			<u>Hours</u>	<u>Amount</u>
10/26/2021	JEN	Review issues raised by clients regarding principles and oral argument; conference with Mr. Sienkowski.	1.00	\$400.00
	ALS	Continue review of maps and cases and parties' memoranda for oral argument.	3.80	\$1,520.00
10/27/2021	JHG	Review briefs; prepare for hearing.	1.50	\$900.00
	ALS	Preparation for and Zoom meeting with clients regarding map reports and oral argument preparation; review cases and memoranda of parties for oral argument.	4.60	\$1,840.00
10/28/2021	JHG	Review all briefs; prepare for hearing.	2.50	\$1,500.00
	ALS	Oral argument preparation.	2.10	\$840.00
10/29/2021	ALS	Prepare for oral argument; review cases.	2.50	\$1,000.00
10/30/2021	ALS	Review cases and submissions; oral argument preparation.	8.50	\$3,400.00
11/1/2021	ALS	Oral argument preparation; zoom meeting with clients.	2.50	\$1,000.00
11/2/2021	JHG	Preparation for oral argument; conference with client, Mr. Sienkowski.	1.50	\$900.00
	JEN	Attorney conference regarding oral argument.	1.00	\$400.00
	ALS	Oral argument preparation.	13.00	\$5,200.00
11/3/2021	JHG	Preparation for and hearing at Court of Appeals.	4.00	\$2,400.00
	NMV	Download, print and index pleadings.	1.60	\$200.00
	JEN	Attend oral argument on principles.	4.00	\$1,600.00
	ALS	Prepare for and attend oral argument.	7.50	\$3,000.00

			<u>Hours</u>	<u>Amount</u>
11/16/2021	ALS	Review press release; email to client.	0.20	\$80.00
11/17/2021	JEN	Review Wattson Plaintiffs' Explanation of Senate Plan.	0.50	\$200.00
11/18/2021	JHG	Review Order; confer with Mr. Sienkowski.	0.50	\$300.00
	JEN	Review Supreme Court Panel Order regarding principles and client emails.	1.00	\$400.00
11/19/2021	JHG	Review Order; confer on strategy, timing.	0.70	\$420.00
	JEN	Conference with Mr. Sienkowski; video-conference with client regarding strategy and plan submission for maps.	1.50	\$600.00
	ALS	Review principles order; Zoom conference with client regarding plan submissions.	1.50	\$600.00
11/22/2021	JHG	Conference regarding big picture issues with Mr. Sienkowski.	0.80	\$480.00
	JEN	Review Wattson House Plan Reports and charts.	1.00	\$400.00
	ALS	Review reports and documents for plan submissions brief; video conference with client; outline and draft plan submissions brief.	3.50	\$1,400.00
11/23/2021	ALS	Draft plan submissions brief; telephone conference with client.	2.60	\$1,040.00
11/24/2021	JHG	Review DFL Plan, comments; confer regarding strategy and needs.	1.50	\$900.00
	JEN	Review drafts and client correspondence.	2.00	\$800.00
	ALS	Draft plan submissions brief.	3.70	\$1,480.00
11/26/2021	ALS	Draft plan submissions brief.	7.50	\$3,000.00

			<u>Hours</u>	<u>Amount</u>
11/27/2021	ALS	Draft plan submissions brief.	8.00	\$3,200.00
11/29/2021	ALS	Draft plan submissions memorandum; emails with clients; review reports and documents; legal research.	6.60	\$2,640.00
11/30/2021	ALS	Draft plan submissions memorandum; emails with clients; review reports and documents; legal research.	8.60	\$3,440.00
12/1/2021	NMV	Conferences with Mr. Sienkowski; download, print and index Public Hearing Transcripts.	1.00	\$125.00
	JEN	Review drafts and client correspondence.	1.00	\$400.00
	ALS	Draft plan submissions memorandum.	3.00	\$1,200.00
	ALS	Review plans and report; draft plan submissions memorandum; emails with client; legal research.	4.70	\$1,880.00
12/2/2021	NMV	Conferences with Mr. Sienkowski; telephone conference and emails with printers.	2.00	\$250.00
	ALS	Draft plan submissions memorandum; emails with clients; review reports and documents; legal research.	10.00	\$4,000.00
12/3/2021	JHG	Review DFL/GOP maps posted; conference with Mr. Sienkowski; miscellaneous emails.	0.80	\$480.00
	JEN	Review client correspondence and drafts.	1.50	\$600.00
	ALS	Continue drafting and editing plan submissions memorandum; draft affidavits; review reports and maps; telephone conference and emails with clients.	8.30	\$3,320.00
12/4/2021	ALS	Continue drafting and editing memorandum and affidavits for plans submissions; review exhibits, reports and maps; telephone conferences and emails with clients.	9.00	\$3,600.00

			<u>Hours</u>	<u>Amount</u>
12/5/2021	ALS	Continue drafting and editing memorandum and affidavits; telephone conferences and emails with clients.	14.00	\$5,600.00
12/6/2021	NMV	Conferences with Mr. Sienkowski; merge exhibits for filing.	0.25	\$31.25
	JEN	Finalize submissions for filing.	4.50	\$1,800.00
	ALS	Continue drafting and editing memorandum and affidavits; telephone conferences and emails with clients.	14.50	\$5,800.00
12/7/2021	JHG	Review filing confirmation; conference with Mr. Sienkowski.	1.00	\$600.00
	JEN	Finalize submission and review opposing party submissions.	2.00	\$800.00
	ALS	Finalize and file plan submissions; review party submissions; emails with clients.	4.00	\$1,600.00
12/8/2021	ALS	Review parties filings; emails with clients.	1.50	\$600.00
12/10/2021	ALS	Review briefs and plans of parties; begin outline for memorandum and drafting; emails and Zoom with clients.	7.50	\$3,000.00
12/11/2021	ALS	Review parties' briefs, plans and maps; work on memorandum.	7.70	\$3,080.00
12/12/2021	ALS	Review parties' submissions; draft memorandum; emails with clients.	11.00	\$4,400.00
12/13/2021	JEN	Legal research; review public hearing transcripts and other parties' congressional plans briefs.	6.00	\$2,400.00

			<u>Hours</u>	<u>Amount</u>
12/13/2021	ALS	Draft sections of memorandum; review documents and maps from client; emails with clients; review parties' briefs, plans, and reports; draft congressional section.	13.10	\$5,240.00
12/14/2021	JEN	Finalize submission and review opposing party submissions.	7.00	\$2,800.00
	ALS	Continue review of parties' plans and reports; emails with clients; draft memorandum; review maps and data from client.	9.80	\$3,920.00
12/15/2021	JEN	Draft and revise response and client affidavits.	9.25	\$3,700.00
	ALS	Review plans and reports of parties; draft memorandum and affidavits; emails with clients.	8.70	\$3,480.00
12/16/2021	JEN	Continuing drafting and revising response and client affidavits.	9.25	\$3,700.00
	ALS	Review plans and reports of parties; draft memorandum and affidavits; review, select, and compile affidavit exhibits; emails with clients.	16.50	\$6,600.00
12/17/2021	JEN	Draft and finalize response and client affidavits.	9.50	\$3,800.00
	ALS	Draft brief and affidavits; emails with clients; finalize and file documents.	15.50	\$6,200.00
12/20/2021	JEN	Check filed submissions for accuracy and completeness.	1.00	\$400.00
	ALS	Email to clients; work with court to get exhibits uploaded.	1.50	\$600.00
12/28/2021	JHG	Conference with Mr. Sienkowski; strategy and map reviews.	1.00	\$600.00
	ALS	Begin preparing visual presentation; read the briefs of the parties; review plans; prepare for redistricting hearing.	10.30	\$4,120.00

			<u>Hours</u>	<u>Amount</u>
12/29/2021	ALS	Prepare visual presentation; prepare for presentation of redistricting plan; review files and plans; emails with clients; review plans of parties.	8.80	\$3,520.00
12/30/2021	JEN	Research compliance with Section 2 of Voting Rights Act.	1.00	\$400.00
	ALS	Review plans and files for presentation; prepare visual presentation; telephone conferences and emails with clients; prepare for redistricting presentation.	6.50	\$2,600.00
12/31/2021	JHG	Review filings; preparation with Mr. Sienkowski.	1.30	\$780.00
	ALS	Preparation of visual presentation; review maps and plans; emails and telephone calls with clients; prepare for presentation of redistricting plans.	9.50	\$3,800.00
1/1/2022	ALS	Review maps and plans; prepare visual presentation; telephone conferences and emails with clients; prepare for presentation of redistricting plans.	14.50	\$5,800.00
1/2/2022	ALS	Continue creating visual presentation; telephone conferences and emails with clients; prepare for presentation of redistricting plans.	12.50	\$5,000.00
1/3/2022	JHG	Preparation for hearing with Mr. Sienkowski and Ms. Nahlovsky.	2.00	\$1,200.00
	JEN	Review PowerPoint presentation, previous submissions, and prepare materials for oral argument.	4.50	\$1,800.00
	ALS	Preparation for presentation of redistricting plans; complete and send presentation to panel; review parties' briefs.	11.00	\$4,400.00
1/4/2022	JHG	Preparation for and attend panel hearing.	7.50	\$4,500.00
	JEN	Oral argument.	8.00	\$3,200.00

			<u>Hours</u>	<u>Amount</u>
1/4/2022	ALS	Presentation of redistricting plans.	7.50	\$3,000.00
1/7/2022	ALS	Telephone conference with client.	0.30	\$120.00
1/10/2022	NMV	Continue to print and index court filings.	0.50	\$62.50
1/11/2022	JEN	Review client emails.	0.20	\$80.00
1/12/2022	NMV	Continue to print and index court filings.	0.25	\$31.25
1/13/2022	JHG	Review legislative plan.	0.75	\$450.00
	NMV	Continue to index court filings.	0.75	\$93.75
	ALS	Zoom call with client.	0.80	\$320.00
2/14/2022	ALS	Telephone conference with client.	0.20	\$80.00
2/15/2022	JHG	Review new district decision; confer with Mr. Sienkowski; miscellaneous emails; comparisons.	1.00	\$600.00
	JEN	Review court maps; attorney conference.	1.00	\$400.00
	ALS	Review order, maps and reports; emails with client.	2.50	\$1,000.00
2/16/2022	JHG	Review comparisons, court order.	0.50	\$300.00
2/23/2022	ALS	Review court plans and client reports; telephone conference with client.	2.20	\$880.00
2/24/2022	JHG	Review plan comparisons, swing to loose pendulum.	0.50	\$300.00
Total for professional services rendered				<u>\$304,196.25</u>